

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Law Offices of Bruce J. Chasan, LLC
Bruce J. Chasan, Esq.

Plaintiffs

vs.

Pierce Bainbridge Beck Price &
Hecht, LLP
John M. Pierce, Esq.
James Bainbridge, Esq.
Carolynn Beck, Esq.
Maxim Price, Esq.
David L. Hecht, Esq.
Pravati Capital LLC

Defendants

Civ. No. 2:20-cv-1338-AB

JURY TRIAL DEMANDED

**PLAINTIFFS' REPLY TO PRAVATI CAPITAL LLC'S OPPOSITION
(ECF 46) TO PLAINTIFF'S MOTION FOR LEAVE TO
FILE A SURREPLY MEMORANDUM OF LAW (ECF 42)**

Plaintiffs, believing full and robust briefing by all parties assists the Court in rendering the best decision, submit this Reply to the Pravati brief (ECF 46) opposing Plaintiffs' Motion for Leave to File a Surreply (ECF 42).

1. The bulk of Pravati's argument contends no surreply should be allowed notwithstanding that Pravati's reply brief included three pages of argument on res judicata (ECF 40 at 8-11) whereas its brief in support of its motion to dismiss had a only a one sentence joinder in the PBBPH Law brief (ECF 25-1 at 2, n.1). Respectfully, this makes no sense.

2. Pravati does not argue at all against the surreply directed to Pravati's entirely new argument in its reply brief that there was no unjust enrichment even if a benefit was conferred. See ECF 40 at 6-8, citing, *inter alia*, *Meehan v. Cheltenham Township*, 189 A.2d 593 (Pa. 1963). This should be deemed a concession that a surreply is justified.

3. Pravati's Opposition (ECF 46) devotes a number of sentences to supporting its motion for Rule 11 sanctions (ECF 44). Plaintiffs and Mr. Haines will file a timely response to the Rule 11 Motion but will not go into here.

4. Pravati chastises Plaintiffs for exceeding page limits and not adhering to deadlines in the Court's policies and procedures. Plaintiffs apologize. Law Offices of Bruce J. Chasan, LLC is a solo practice, and does not have the legions of the Cohen Seglias and Zarwin Baum law firms. Plaintiffs appreciate that the Court grants some latitude as long as statutory deadlines or strict deadlines in the Rules of Civil Procedure are not missed. Also, as the Court is aware, Attorney Chasan uses Verdana 12-point font (both for text *and* footnotes), which is larger and more readable than Times New Roman 12-point font used by the Defendants. This results in more pages, but Attorney Chasan has found that most jurists appreciate the easier-to-read font. Indeed, the Superior Court of Pennsylvania now mandates use of 14-point Verdana font in appellate briefs (albeit there is a word limit).

Respectfully submitted,

/s/ Clifford E. Haines

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Date: August 17, 2020

CERTIFICATE OF SERVICE

I, Bruce J. Chasan, hereby certify that on August 17, 2020, I caused a true and correct copy of the foregoing Reply to the Pravati Capital LLC Opposition (ECF 46) to Plaintiffs' motion for leave to file a Surreply Brief (ECF 42) in Opposition to the Pravati Motion to Dismiss the Amended Complaint (ECF 25), to be filed via the Court's electronic filing system, which constitutes service upon counsel of record for the Pierce Bainbridge Defendants and Pravati Capital LLC, as follows:

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/S/ Bruce J. Chasan

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